

## PROPOSED CONTENTS ON RE IN DEQ'S MILESTONE-LIKE SOURCE CONTROL SUMMARY REPORT

(target submittal to EPA in Summer 2013 – prior to Proposed Plan so that recontamination potential can be factored into the remedy selection process, per 2005 EPA *Contaminated Sediment Remediation Guidance for Hazardous Waste Sites*)

- Demonstration of SC Effectiveness (per JSCS) = Screening Level RE section (Qualitative) (pending final Risk Assessment(s) & water & sediment levels set in ROD)
  - Areas under SCE/SCD – SW, GW, Banks...
    - List SCDs that will stand (“SCMs documented and evaluated to prevent recontamination” – JSCS)\*
    - List SCDs that may need re-evaluation – additional data for RE/LA
  - Regions for further RE/LA (confirmed through overlay w/ EPA risk analyses)
    - Areas of on-going discharge (unable to control) w/ plan for RE
    - By RPs per SCD re-evaluations
    - By EPA/DEQ/City in areas of special concern or gaps
  - Programs (DEQ, City, ODOT)
    - NPDES discharge monitoring (esp. PH 1200Z) as effectiveness tool – PH 1200Z annual trends?
    - Typical curves update
    - DEQ 319, SRF, TMDL, 401 dredging, toxics reduction strategy (WQ, AQ, LQ)
    - City OFs – CSO diversions, Industrial permitting, SW Manual & programs...
    - ODOT BMPs & maintenance
  - Individual sites data & any loading analyses
    - Individual site data comparisons (per SCDs and on-going 1200Z monitoring)
    - REs done to date (voluntarily or otherwise)
  - Upstream info
    - Downtown Reach study/data
    - Other CU sites info (e.g., Zidell, Ross Island)
    - NPDES discharge data (upstream and tribs sources)
    - Other WQ, AQ & LQ programs work

\*2005 EPA *Contaminated Sediment Remediation Guidance for Hazardous Waste Sites* describes source control actions as potentially including “application of regulatory mechanisms and remedial technologies to be implemented according to ARARs, including the application of technology-based and water quality-based NPDES permitting to achieve and maintain sediment cleanup levels. Source control actions may include, among other, the following:

- Elimination or treatment of contaminated waste water of ground water discharges (e.g., installing additional treatment systems prior to discharge);
- Isolation or containment of sources (e.g., capping of contaminated soil) with attendant engineering controls;
- Pollutant load reductions of point and nonpoint sources based on a TMDL;
- Implementation of best management practices (e.g., reducing chemical releases to a storm drain line); and
- Removal or containment of potentially mobile sediment hot spots.